

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LORD ABBETT AFFILIATED FUND, INC.,
et al., Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

NAVIENT CORPORATION, *et al.*,
Defendants.

C.A. No. 16-112-MN

Judge Maryellen Noreika

PUBLIC VERSION

FILED ON: September 13, 2019

**DECLARATION OF JEREMY P. ROBINSON IN SUPPORT OF PLAINTIFFS’
MOTION FOR CLASS CERTIFICATION, APPOINTMENT OF CLASS
REPRESENTATIVES, AND APPOINTMENT OF COUNSEL**

JEREMY P. ROBINSON hereby declares, pursuant to 28 U.S.C. §1746, as follows:

1. I am a partner of the law firm Bernstein Litowitz Berger & Grossmann LLP (“BLB&G”), which represents the Court-appointed Lead Plaintiffs Lord Abbett Affiliated Fund, Inc., Lord Abbett Equity Trust – Lord Abbett Calibrated Mid Cap Value Fund, Lord Abbett Bond-Debt Fund, Inc., and Lord Abbett Investment Trust – Lord Abbett High Yield Fund (the “Lord Abbett Funds”) in this Action and which this Court appointed as Lead Counsel by Order dated April 26, 2019. D.I. 89. I am licensed to practice law in the State of New York and I am admitted to practice *pro hac vice* before this Court.

2. I submit this declaration in support of Plaintiffs’ Motion for Class Certification, Appointment of Class Representatives, and Appointment of Counsel. I have personal knowledge of the facts set forth herein and, if called to testify, could and would testify competently thereto.

3. Since this Court appointed BLB&G as Lead Counsel, Lead Counsel has, among other things, under the Lord Abbett Funds’ supervision and direction: thoroughly analyzed and

investigated the securities law claims at issue; vigorously pursued discovery from Defendants and other third parties; assisted the Lord Abbett Funds in responding to Defendants' discovery requests, including by producing responsive documents and answering interrogatories; retained a market efficiency expert; and regularly updated the Lord Abbett Funds on developments in this litigation, the contents of which communications remain subject applicable privileged, including the attorney-client privilege and/or the work product privilege.

4. Lead Counsel is willing and able to commit the necessary resources to achieve a successful recovery for the proposed Class.

5. Attached as Exhibit A is a true and correct copy of the document bearing Bates numbers NAV-LRD-ABT-000027711 through NAV-LRD-ABT-000027713 (designated "CONFIDENTIAL"), with yellow highlighting added by counsel to denote the pertinent portion of the document.

6. Attached as Exhibit B is a true and correct copy of the document bearing Bates numbers NAV-LRD-ABT-000049277 through NAV-LRD-ABT-000049296 (designated "CONFIDENTIAL"), with yellow highlighting added by counsel to denote the pertinent portions of the document.

7. Attached as Exhibit C is a true and correct copy of Navient's April 17, 2014 Form 8-K filed with the United States Securities and Exchange Commission (the "SEC").

8. Attached as Exhibit D is a true and correct copy of Navient's May 9, 2014 Form 10-Q filed with the SEC.

9. Attached as Exhibit E is a true and correct copy of Navient's February 27, 2015 Form 10-K filed with the SEC.

10. Attached as Exhibit F is a true and correct copy of Navient's August 1, 2014 Form 10-Q filed with the SEC.

11. Attached as Exhibit G is a true and correct copy of the Second Amended Class Action Complaint in this Action (D.I. 59), filed on November 17, 2017.

12. Attached as Exhibit H is a true and correct copy of the Court's January 29, 2019 Order denying in part Defendants' motion to dismiss and sustaining the Complaint, *Lord Abbett Affiliated Fund, Inc. v. Navient Corp.*, 363 F. Supp. 3d 476, (D. Del. 2019).

13. Attached as Exhibit I is a true and correct copy of the Expert Report of Michael L. Hartzmark, Ph.D, dated September 6, 2019.

14. Attached as Exhibit J is a true and correct copy of the Declaration of Lawrence B. Stoller in Support of Plaintiffs' Motion for Class Certification, Appointment of Class Representatives, and Appointment of Counsel, dated September 6, 2019.

15. Attached as Exhibit K is a true and correct copy of the firm resume of BLB&G.

16. Attached as Exhibit L is a true and correct copy of the firm resume of Friedlander & Gorris P.A. ("Friedlander").

17. Attached as Exhibit M is a true and correct copy of the Colorado Attorney General's Press Release dated September 3, 2019.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 6, 2019
New York, NY

By:


Jeremy P. Robinson